

The Honorable Barbara J. Rothstein

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

D.S.; D.Y. by and through his next friend JULIE KELLOGG-MORTENSEN; H.A. by and through his next friend KRISTEN BISHOPP; and DISABILITY RIGHTS WASHINGTON, a nonprofit membership organization for the federally mandated Protection and Advocacy Systems,

Plaintiffs,

V.

WASHINGTON STATE
DEPARTMENT OF CHILDREN,
YOUTH, AND FAMILIES; and ROSS
HUNTER, in his official capacity as
Secretary of the Washington State
Department of Children, Youth, and
Families

Defendants.

NO. 2:21-cv-00113-BJR

UNOPPOSED MOTION TO
SUBSTITUTE LOCAL COUNSEL
PURSUANT TO LOCAL RULE
83.1(d)

1 Plaintiffs move to substitute Christopher Carney as the Local Counsel for attorneys
2 Poonam Juneja, Freya Pitts, and Jean Strout of the National Center for Youth Law, and Laura
3 Lin of Munger, Tolles, & Olson LLP, who have been admitted to appear and participate in this
4 case *pro hac vice* pursuant to Local Rule 83.1(d). Susan Kas of Disability Rights Washington,
5 who previously served as their Local Counsel, has withdrawn from this case simultaneously
6 with this motion. Christopher Carney's Statement of Local Counsel is attached in support of
7 this motion.

8 Defendants have represented that they do not oppose this motion.
9

10 Dated: October 14, 2022

11 Respectfully submitted,

12 **DISABILITY RIGHTS WASHINGTON**

13 */s/ Carina Tong*
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16 Seattle, WA 98104
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18 **CARNEY GILLESPIE PLLP**

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24 **NATIONAL CENTER FOR YOUTH LAW**

25 */s/ Poonam Juneja*
26 Poonam Juneja, *admitted pro hac vice*

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9
10 **CHILDREN'S RIGHTS**

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12 */s/ Leecia Welch*
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18 **MUNGER, TOLLES & OLSON LLP**

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20 */s/ Laura Lin*
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34 **ATTORNEYS FOR PLAINTIFFS**

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2022, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Marko Pavela marko.pavela@atg.wa.gov

James Richardson james.richardsoniii@atg.wa.gov

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 14th day of October, 2022.

Mona Rennie, Legal Assistant

Disability Rights Washington

The Honorable Barbara J. Rothstein

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NO. 2:21-cv-00113-BJR

**ORDER GRANTING
UNOPPOSED MOTION TO
SUBSTITUTE LOCAL
COUNSEL PURSUANT TO
LOCAL RULE 83.1(d)**

Having considered Plaintiffs' Unopposed Motion to Substitute Local Counsel Pursuant to Local Rule 83.1(d), and its supporting papers, the Court hereby GRANTS the motion.

Christopher Carney is substituted as the Local Counsel for attorneys Poonam Juneja, Freya Pitts, and Jean Strout of the National Center for Youth Law, and Laura Lin of Munger, Tolles, & Olsen LLP, who have been admitted to appear and participate in this case *pro hac vice* pursuant to Local Rule 83.1(d).

DATED this 3rd day of November, 2022.



BARBARA J. ROTHSTEIN
United States District Judge

Presented by:

DISABILITY RIGHTS WASHINGTON

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13 **CHILDREN'S RIGHTS**
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STATEMENT OF LOCAL
COUNSEL IN SUPPORT OF
UNOPPOSED MOTION TO
SUBSTITUTE LOCAL COUNSEL
PURSUANT TO LOCAL RULE
83.1(d)

I am authorized and will be prepared to handle this matter, including trial, in the event the applicants, Poonam Juneja, Freya Pitts, Jean Strout, and Laura Lin, are unable to be present upon any date assigned by this Court.

Dated: October 14, 2022

Respectfully submitted,

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